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Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
 )  
v. )  
 )  
JOSEPH ORTIZ, et al., )  
 )  
Defendant. )

No. CR 12-0119 SI

STIPULATION AND ~~PROPOSED~~  
ORDER EXCLUDING TIME UNDER THE  
SPEEDY TRIAL ACT FROM AUGUST 3,  
2012 TO OCTOBER 12, 2012

The instant matter was set before the Court on August 3, 2012 for a hearing on the defendants' motion for discovery. The matter was not called because of a conflict in the Court's schedule. Instead, the Court referred all discovery related matters to the Honorable Judge Beeler. See Order of Referral (Docket #242). The parties since conferred and jointly request that the Court calendar the instant matter before the Judge Illston on October 12, 2012 at 11:30 a.m. for a status appearance.

Additionally, the parties agree that time should be excluded from August 3, 2012 to October 12, 2012 under the Speedy Trial Act for effective preparation of counsel because granting the

1 exclusion of time is necessary in light of the ongoing production of discovery taking into account  
2 the exercise of due diligence. See 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The  
3 parties also agree that an exclusion of time under the Speedy Trial Act is appropriate because the  
4 instant case is a complex matter and because the ends of justice served by granting such a  
5 continuance outweigh the best interests of the public and the defendants in a speedy trial. See  
6 18 U.S.C. § 3161(h)(7)(B)(ii) & (h)(7)(A).

7  
8 SO STIPULATED:

9  
10 Dated: August 9, 2012

MELINDA HAAG  
United States Attorney

11  
12 By: /s/

13 Acadia L. Senese  
14 W.S. Wilson Leung  
Assistant United States Attorneys

15  
16 Dated: August 10, 2012

/s/  
Shawn Halbert, Esq.  
Edward A. Smock, Esq.  
John T. Philipsborn, Esq.  
Attorneys for Defendant Joseph Ortiz

17  
18  
19  
20 Dated: August 23, 2012

/s/  
William I. Osterhoudt, Esq.  
Richard B. Mazer, Esq.  
Attorneys for Defendant Victor Flores

21  
22  
23 Dated: August 9, 2012

/s/  
David L. Andersen, Esq.  
Richard A. Tamor, Esq.  
Attorneys for Defendant Justin Whipple

24  
25  
26  
27 Dated: August 9, 2012

/s/  
Stuart D. Hanlon, Esq.  
Geoffrey Rottwein, Esq.  
Attorney for Defendant Benjamin Campos-Gonzalez

1 Dated: August 9, 2012

/s/  
\_\_\_\_\_  
Garrick S. Lew, Esq.  
Attorney for Defendant Michael Ortiz, Jr.

4 Dated: August 9, 2012

/s/  
\_\_\_\_\_  
Mary G. McNamara, Esq.  
Attorney for Defendant Michael Ortiz, Sr.

7 Dated: August 14, 2012

/s/  
\_\_\_\_\_  
Linda A. Fullerton, Esq.  
Attorney for Defendant Armando Acosta

10 Dated: August 10, 2012

/s/  
\_\_\_\_\_  
Kenneth H. Wine, Esq.  
Attorney for Defendant Giovanni Rimando Ascencio

13 Dated: August 10, 2012

/s/  
\_\_\_\_\_  
Galia A. Phillips  
Attorney for Defendant Raymond Hembry

16 Dated: August 10, 2012

/s/  
\_\_\_\_\_  
Alan A. Dressler, Esq.  
Attorney for Defendant James Hembry

19 Dated: August 10, 2012

/s/  
\_\_\_\_\_  
Edwin K. Prather, Esq.  
Attorney for Defendant Richard Martinez

22 Dated: August 9, 2012

/s/  
\_\_\_\_\_  
Frank Bell, Esq.  
Attorney for Defendant Gregorio Guzman

25 Dated: August 23, 2012

/s/  
\_\_\_\_\_  
George C. Boisseau, Esq.  
Attorney for Defendant Mario Bergren

28 Dated: August 14, 2012

/s/  
\_\_\_\_\_  
Paul Wolf, Esq.  
Attorney for Defendant Andrew Bryant

1 Dated: August 9, 2012

/s/  
\_\_\_\_\_  
Julia M. Jayne, Esq.  
Attorney for Defendant Peter Davis

4 Dated: August 9, 2012

/s/  
\_\_\_\_\_  
K.C. Maxwell, Esq.  
Attorney for Defendant Louis Rodriguez

7 Dated: August 9, 2012

/s/  
\_\_\_\_\_  
Robert F. Waggener, Esq.  
Attorney for Defendant Tanya Rodriguez

10 Dated: August 9, 2012

/s/  
\_\_\_\_\_  
Suzanne M. Morris, Esq.  
Attorney for Defendant Betty Ortiz

13 IT IS SO ORDERED.

15 Dated: August 24, 2012

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\_\_\_\_\_  
HON. SUSAN ILLSTON  
United States District Judge